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Attorneys for Defendant  
THOMAS P. SCHMALZRIED, M.D.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

GERALDINE BARSOTTI,  
  
Plaintiff,  
  
v.

JOHNSON & JOHNSON SERVICES,  
INC.; JOHNSON & JOHNSON, INC.;  
DEPUY ORTHOPAEDICS, INC.;  
THOMAS P. SCHMALZRIED, M.D.;  
PINNACLE WEST ORTHOPAEDICS,  
INC.; GOLDEN STATE  
ORTHOPAEDICS, INC.; AND DOES  
ONE through ONE HUNDRED,  
Defendants,

Case No. 3:15-cv-03603-EMC

**STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT RE  
DEFENDANT THOMAS P. SCHMALZRIED,  
M.D.**

Complaint served: July 20, 2015  
Removed: August 06, 2015  
Current Response Date: August 13, 2015  
Agreed Response Date: September 14, 2015

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant Thomas P. Schmalzried, M.D. ("Defendant") hereby request and Plaintiff Geraldine Barsotti ("Plaintiff") hereby agree to Defendant's request, for an extension of time for Defendant to file a response to Plaintiff's Complaint as follows:

WHEREAS, Plaintiff's Complaint was filed in state court on June 23, 2015 and Defendant was served on or about July 20, 2015;

WHEREAS, this matter was removed to this court on August 06, 2015;

1 WHEREAS, Defendant request an extension up to and including September 14, 2015,  
2 to file a responsive pleading to Plaintiff's Complaint. Plaintiff has agreed to Defendant's  
3 request.

4 THEREFORE, the parties agree that Defendant Thomas P. Schmalzried, M.D. will  
5 have until September 14, 2015 to file its response to Plaintiff's Complaint.

6 **IT IS SO STIPULATED.**

7  
8 DATED: August 11, 2015

SEDGWICK LLP

9  
10 By: /s/ Christopher P. Norton

Ralph A. Campillo, Esq.

Wendy A. Tucker, Esq.

Christopher Norton, Esq.

12 Attorneys for Defendant

13 THOMAS P. SCHMALZRIED, M.D.

14  
15 DATED: August 11, 2015

WALKUP, MELODIA, KELLY & SCHOENBERGER

17 By: /s/ Matthew D. Davis

Matthew D. Davis

18 Khaldoun A. Baghdadi, Esq.

19 Attorneys for Plaintiff

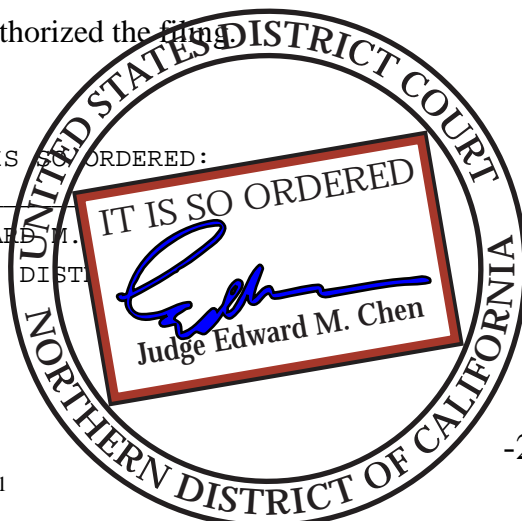
20 GERALDINE BARSOTTI

21 \*Pursuant to Local Rule 5-1(i)(3), Christopher Norton hereby attests that all other  
22 signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and  
23 have authorized the filing.

24  
25 IT IS SO ORDERED:

26 EDWARD M.

27 U.S. DIST.



**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick LLP, 801 South Figueroa Street, 19th Floor, Los Angeles, California 90017-5556. On August 18, 2015, I served the within document(s):

**STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT (L.R. 8-3) RE DEFENDANTS THOMAS P. SCHMALZRIED, M.D.**

- ☐ MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California.
- ☒ ELECTRONIC MAIL – by serving via CM/ECF to the United States District Court, Northern District of California, addressing all parties appearing on the Courts ECF service list.

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**Attorneys for Plaintiff GERALDINE  
BARSOTTI**

**Attorneys for Defendant  
DEPUY ORTHOPAEDICS, INC.**

I declare that I am employed in the office of a member of the bar of this court at who direction the service was made.

Executed at Los Angeles, California on August 18, 2015.

/s/ Kim Włodarczak  
Kim Włodarczak